

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

CAREFREE PARK CORPORATION, AMIN
NABHAN and JAMILE NABHAN,

Plaintiffs,

v.

ADIB NABHAN,

Defendant.

Civil Action No. 2003-CV-12426 RCL

PLAINTIFFS' PROPOSED JURY VERDICT FORM

Plaintiffs Carefree Park Corporation, Amin Nabhan and Jamile Nabhan hereby propose that the Court submit the following questions to the jury. Plaintiffs submit these proposed jury questions without prejudice to their claim that the Court should enter a directed verdict in plaintiffs' favor on all of defendant's counterclaims against plaintiffs.

Plaintiffs' Claims Against Adib Nabhan

1. Did Adib Nabhan breach his fiduciary duty to Carefree Park Corporation and to Amin Nabhan and Jamile Nabhan?

Yes _____ No _____

If your answer is Yes, please proceed to Question 2. If your answer is No, please proceed to Question 5.

2. Was Fun Depot, Inc. a corporate opportunity that belonged to Carefree Park Corporation?

Yes _____ No _____

3. Were Carefree Park, Amin Nabhan and Jamile Nabhan damaged as a result of Adib Nabhan's breach of his fiduciary duty?

Yes_____ No_____

If your answer is Yes, please proceed to Question 4. If your answer is No, please proceed to Question 5.

4. What damages are Carefree Park Corporation, Amin Nabhan and Jamile Nabhan entitled to recover from Adib Nabhan for his breach of his fiduciary duty?

\$_____

(Please write the amount in words and numbers)

Defendant's Counterclaims Against Plaintiffs

5. Did Amin Nabhan breach his fiduciary duties to Adib Nabhan as an officer and director of Carefree Park Corporation?

Yes_____ No_____

If your answer is Yes, please proceed to Question 6. If your answer is No, please proceed to Question 8.

6. Was Adib Nabhan damaged as a result of Amin Nabhan's breach of his fiduciary duty as an officer and director of Carefree Park Corporation?

Yes_____ No_____

If your answer is Yes, please proceed to Question 7. If your answer is No, please proceed to Question 8.

7. What damages is Adib Nabhan entitled to recover from Amin Nabhan for his breach of his fiduciary duty as an officer and director of Carefree Park Corporation?

\$_____

(Please write the amount in words and numbers)

8. Did Amin Nabhan breach his fiduciary duties to Adib Nabhan as a trustee of various realty trusts?

Yes _____ No. _____

If your answer is Yes, proceed to Question 9. If your answer is No, please proceed to Question 11.

9. Was Adib Nabhan damaged as a result of Amin Nabhan's breach of fiduciary duty as a trustee of various realty trusts?

Yes _____ No. _____

If your answer is Yes, please proceed to Question 10. If your answer is No, please proceed to Question 11.

10. What damages is Adib Nabhan entitled to recover as a result of Amin Nabhan's breach of fiduciary duty as trustee of various realty trusts?

(Please write out the damages in words)

11. Did Jamile Nabhan breach her fiduciary duties to Adib Nabhan as a director of Carefree Park Corporation?

Yes _____ No _____

If your answer is Yes, please proceed to Question 12. If your answer is No, please proceed to Question 14.

12. Was Adib Nabhan damaged as a result of Jamile Nabhan's breach of her fiduciary duty as a director of Carefree Park Corporation?

Yes _____ No _____

If your answer is Yes, please proceed to Question 13. If your answer is No, please proceed to Question 14.

13. What damages is Adib Nabhan entitled to recover from Jamile Nabhan for her breach of her fiduciary duty as a director of Carefree Park Corporation?

\$ _____

(Please write the amount in words and numbers)

14. Is Adib Nabhan entitled to payment for services rendered to Carefree Park Corporation?

Yes _____ No _____

If your answer is Yes, please proceed to Question 15. If your answer is No, please proceed to Question 16.

15. How much is Adib Nabhan entitled to receive from Carefree Park Corporation for services rendered to Carefree Park Corporation?

\$ _____

(Please write the amount in words and numbers)

16. Is Adib Nabhan entitled to repayment of any monies that he advanced to Carefree Park Corporation over the years?

Yes _____ No _____

If your answer is Yes, please proceed to Question 17. If your answer is No, please proceed to Question 18.

17. How much is Adib Nabhan entitled to recover from Carefree Park Corporation for the amount he advanced to Carefree Park Corporation?

\$ _____

(Please write the amount in words and numbers)

Affirmative Defense

18. Do you find that plaintiffs' claims against Adib Nabhan are barred by the applicable statute of limitations?

Yes_____ No_____

19. Do you find that Adib Nabhan's counterclaims against the plaintiffs are barred by the applicable statute of limitations?

Yes_____ No_____

Foreperson of the Jury

CAREFREE PARK CORPORATION, AMIN
NABHAN AND JAMILE NABHAN

By their attorneys,

/s/_____
Robert L. Kirby, Jr. (BBO #550538)
Gordon M. Jones, III (BBO # 549016)
Nixon Peabody LLP
100 Summer Street
Boston, MA 02110-2131
(617) 345-1000

Dated: February 28, 2006

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the above document was served electronically upon the attorney of record for each other party on February 28, 2006.

/s/_____
Robert L. Kirby, Jr.